

1 Lesley D. Bohleber (SBN 49150)
2 LLueke@aldridgepite.com
3 **ALDRIDGE PITE, LLP**
4 The Ogden Building
5 9311 SE 36th St, Ste 207
6 Mercer Island, WA 98040
7 Telephone: (425) 644-6471

Honorable Timothy W. Dore
Chapter: 13

5 **Mailing Address:**

4375 Jutland Drive, Suite 200
P.O. Box 17933
San Diego, CA 92177-0933
Telephone: (858) 750-7600
Facsimile: (619) 590-1385

8 Attorneys Creditor

9 U.S. Bank National Association, as Trustee for
10 Structured Adjustable Rate Mortgage Loan Trust,
11 Mortgage Pass-Through Certificates, Series 2005-
12 19XS

13 **UNITED STATES BANKRUPTCY COURT**

14 **WESTERN DISTRICT OF WASHINGTON (SEATTLE)**

15 In re

16 SHELLISE BARTOM MONTGOMERY,

17 Debtor.

18 No. 20-12657-TWD

19 Chapter 13

**U.S. BANK NATIONAL ASSOCIATION,
AS TRUSTEE FOR STRUCTURED
ADJUSTABLE RATE MORTGAGE
LOAN TRUST, MORTGAGE PASS-
THROUGH CERTIFICATES, SERIES
2005-19XS'S NOTICE OF DEBTOR'S
REQUEST FOR FORBEARANCE DUE
TO THE COVID-19 PANDEMIC**

20

21 Now comes Creditor U.S. Bank National Association, as Trustee for Structured
22 Adjustable Rate Mortgage Loan Trust, Mortgage Pass-Through Certificates, Series 2005-19XS
23 ("Creditor"), by and through undersigned counsel, and hereby submits Notice to the Court of the
24 Debtor's request for mortgage payment forbearance based upon a material financial hardship
25 caused by the COVID-19 pandemic.

26 The Debtor recently Nationstar Mortgage LLC d/b/a Mr. Cooper, the servicing agent for
27 Creditor, requesting a forbearance period of (6) months and has elected to not tender mortgage
28

**NOTICE OF DEBTOR'S REQUEST FOR FORBEARANCE DUE TO
THE COVID-19 PANDEMIC**

Page 1

ALDRIDGE PITE, LLP
4375 Jutland Drive; P.O. Box 17933
San Diego, CA 92177-0933
Telephone: (425)644-6471

1 payments to Creditor that would come due on the mortgage starting October 1, 2020 through
2 March 1, 2021. Creditor holds a secured interest in real property commonly known as 1428
3 Martin Luther King Jr Way, Seattle, WA 98122. Creditor, at this time, does not waive any rights
4 to collect the payments that come due during the forbearance period. If the Debtor desires to
5 modify the length of the forbearance period or make arrangements to cure for the forbearance
6 period arrears, Creditor asks that the Debtor or Counsel for the Debtor make those requests
7 through undersigned counsel.

8 Per the request, Debtor will resume Mortgage payments beginning April 1, 2021 and will
9 be required to cure the delinquency created by the forbearance period (hereinafter “forbearance
10 arrears”). Creditor has retained undersigned counsel to seek an agreement with Debtor regarding
11 the cure of the forbearance arrears and submit that agreement to the Court for approval. If Debtor
12 fails to make arrangements to fully cure the forbearance arrears, Creditor reserves its rights to
13 seek relief from the automatic stay upon expiration of the forbearance period.

14 ALDRIDGE PITE, LLP
15
16 Dated: November 10, 2020 /s/ Lesley D. Bohleber (SBN 49150)
17 LESLEY D. BOHLEBER
18 Attorneys for Creditor U.S. Bank National
19 Association, as Trustee for Structured Adjustable
20 Rate Mortgage Loan Trust, Mortgage Pass-Through
21 Certificates, Series 2005-19XS
22
23
24
25
26
27
28

**NOTICE OF DEBTOR'S REQUEST FOR FORBEARANCE DUE TO
THE COVID-19 PANDEMIC**

Page 2

ALDRIDGE PITE, LLP
4375 Jutland Drive; P.O. Box 17933
San Diego, CA 92177-0933
Telephone: (425)644-6471

1 Lesley D. Bohleber (SBN 49150)
2 LLueke@aldridgepite.com
(SBN)
3 **ALDRIDGE PITE, LLP**
4 The Ogden Building
5 9311 SE 36th St, Ste 207
6 Mercer Island, WA 98040
7 Telephone: (425) 644-6471
8 Facsimile: (619) 590-1385

Honorable Timothy W. Dore
Chapter: 13

2

Mailing Address:

4375 Jutland Drive, Suite 200
P.O. Box 17933
San Diego, CA 92177-0933
Telephone: (858) 750-7600
Facsimile: (619) 590-1385

11 **UNITED STATES BANKRUPTCY COURT**
12 **WESTERN DISTRICT OF WASHINGTON**

13 In re
14 SHELLISE BARTOM MONTGOMERY,
15 Debtor.

Case No. 20-12657-TWD

Chapter 13

PROOF OF SERVICE

I, Shannon C. Lehmann, declare that:

I am employed by Aldridge Pite, LLP. My business address is 4375 Jutland Drive, Suite 200; P.O. Box 17933, San Diego, CA 92177-0933. I am over the age of eighteen years and not a party to this cause.

On November 10, 2020, I caused the following documents:

• **Notice of Forbearance Agreement**

to be served in said cause by placing a copy thereof enclosed in a sealed envelope with postage thereon fully prepaid in the United States Mail, California and/or via electronic means pursuant to Local Bankruptcy Rule 5005-1 as follows:

/././

/././

PROOF OF SERVICE

Page 1

ALDRIDGE PITE, LLP
4375 Jutland Drive, Suite 200
P.O. Box 17933
San Diego, CA 92177-0933
Telephone: (858) 750-7600
Facsimile: (619) 590-1385

DEBTOR

Shellise Bartom Montgomery
PO Box 22922
Seattle, WA 98122
(Via U.S. Mail)

TRUSTEE

Jason Wilson-Aguilar
600 University St #1300
Seattle, WA 98101
courtmail@seattlech13.com
(Via Email)

U.S. TRUSTEE

United States Trustee
700 Stewart St Ste 5103
Seattle, WA 98101
USTPRegion18.SE.ECF@usdoj.gov
(Via Email)

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 10, 2020

/s/ Shannon C. Lehmann
Shannon C. Lehmann

PROOF OF SERVICE

Page 2

ALDRIDGE PITE, LLP
4375 Jutland Drive, Suite 200
P.O. Box 17933
San Diego, CA 92177-0933
Telephone: (858) 750-7600
Facsimile: (619) 590-1385